

From: [Pooja Chaudhuri](#)
To: [Jack DiSorbo](#)
Cc: [Patrick Sweeten](#)
Subject: Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability
Date: Friday, July 8, 2022 1:11:59 PM

Yes, confirmed. Sen. Bettencourt's dep will not proceed on the 11th. I will send out an updated notice.

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Pooja Chaudhuri (*pronouns:* she/her)
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Lawyers' Committee for Civil Rights Under Law
1500 K Street, NW, Suite 900

Washington, D.C. 20005

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From: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Sent: Friday, July 8, 2022 2:09 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

We are happy to do an 8:30 start time. Let's pencil in the 29th. Can I confirm that the deposition will not proceed on the 11th? If you need it, Defendants confirm that they agree for Senator Bettencourt's deposition to be taken out of time.

About Sen. Birdwell—understand, and thank you.

Jack

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Friday, July 8, 2022 1:08 PM
To: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Okay for the 29th. I don't expect to go beyond 3:30 pm with Sen. Bettencourt. But perhaps we can make the start time 8:30 ct if that's okay with you and the Senator?

I'm chatting with the client tonight. So, can likely let you know tomorrow or Sunday about Sen. Birdwell.

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From: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Sent: Friday, July 8, 2022 2:04 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Agreed.

Senator Bettencourt is unavailable on the 27, but can do the 29. He has an appointment at 4:00 pm CT that day, so we would need to be done before 3:30 or so. We would be happy to start early if that would help. Do you think the 29th will work for you?

As to Birdwell—do you have an idea on when you'll know if you intend to go forward with him?

Thanks very much, Jack

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Friday, July 8, 2022 1:01 PM
To: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Thanks so much. Hope we can work something out.

--

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From: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Sent: Friday, July 8, 2022 2:00 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Understood. Checking on those now. I appreciate it.

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Friday, July 8, 2022 12:59 PM
To: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Hi, Jack - I'm in Cincinnati for another case from July 18-21. I plan to be back in Austin the week of Sen. Huffman's deposition. Any chance Sen. Bettencourt can do either the 27th or the 29th ? That week would be preferable for Sen. Birdwell, too, (if we decide that we'd like to go forward with him)?

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From: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>
Sent: Friday, July 8, 2022 1:48 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>
Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting), Deposition availability

Thanks Pooja, this is received.

Very unfortunate timing I know, but I just got off the phone with Senator Bettencourt's chief of staff, who told me several unexpected legislative duties have come up for the Senator. Could we please move the deposition to the 18, 19, or 21? If so, we would agree to allow his deposition to be taken out of time.

Let me know when you can. Thank you,

Jack

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Sent: Friday, July 8, 2022 8:55 AM

To: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; martin.golando@gmail.com; Noor Taj <noor@scsj.org>; Hilary Harris Klein <hilaryhklein@scsj.org>; ddonatti@aclutx.org; tbusser-clancy@aclutx.org; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org; allison@southerncoalition.org; mitchellbrown@scsj.org; aharris@aclutx.org; asegura@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; neil.steiner@dechert.com; Robert@notzonlaw.com; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; mark@markgaber.com; chad@brazilanddunn.com; gainesjesse@ymail.com; David Fox <dfox@elias.law>; Kevin Hamilton <KHamilton@perkinscoie.com>; rhicks@renea-hicks.com; Abha Khanna <akhanna@elias.law>; Aria Branch <abbranch@elias.law>; Nickolas Spencer <nas@naslegal.com>; Brooklyn Morris, Esq. <bmorris@thebledsoelawfirm.com>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Sitton, Jaye (CRT) <Jaye.Sitton@usdoj.gov>; Nina Perales <nperales@maldef.org>; Samantha Serna <sserna@maldef.org>; Kenneth Parreno <kparreno@maldef.org>; npioli@texttrial.com; Sean McCaffity <SMcCaffity@texttrial.com>; Tex Quesada <Quesada@texttrial.com>; jgonzalez@malc.org; Taylor Meehan <taylor@consovoymccarthy.com>; Frank Chang <frank@consovoymccarthy.com>; Adam Mortara <mortara@lawfairllc.com>; Gary Bledsoe <gbledsoe@thebledsoelawfirm.com>

Cc: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>

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Jack - see attached. Deposition subpoena for Sen. Bettencourt.

Thanks,

Pooja

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From: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>

Sent: Tuesday, June 28, 2022 11:48 AM

To: martin.golando@gmail.com <martin.golando@gmail.com>; Noor Taj <noor@scsj.org>; Hilary Harris Klein <hilaryhklein@scsj.org>; ddonatti@aclutx.org <ddonatti@aclutx.org>; tbuser-clancy@aclutx.org <tbuser-clancy@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org <pstegemoeller@aaldef.org>; allison@southerncoalition.org <allison@southerncoalition.org>; mitchellbrown@scsj.org <mitchellbrown@scsj.org>; aharris@aclutx.org <aharris@aclutx.org>; asegura@aclutx.org <asegura@aclutx.org>; slorenzo-giguere@aaldef.org <slorenzo-giguere@aaldef.org>; lindsey.cohan@dechert.com <lindsey.cohan@dechert.com>; neil.steiner@dechert.com <neil.steiner@dechert.com>; Robert@notzonlaw.com <Robert@notzonlaw.com>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; mark@markgaber.com <mark@markgaber.com>; chad@brazilanddunn.com <chad@brazilanddunn.com>; gainesjesse@ymail.com <gainesjesse@ymail.com>; David Fox <dfox@elias.law>; Kevin Hamilton <KHamilton@perkinscoie.com>; rhicks@renea-hicks.com <rhicks@renea-hicks.com>; Abha Khanna <akhanna@elias.law>; Aria Branch <abbranch@elias.law>; Nickolas Spencer <nas@naslegal.com>; Brooklynn Morris, Esq. <bmorris@thebledsoelawfirm.com>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Sitton, Jaye (CRT) <Jaye.Sitton@usdoj.gov>; Nina Perales <nperales@maldef.org>; Samantha Serna <sserna@maldef.org>; Kenneth Parreno <Kparreno@maldef.org>; npioli@texttrial.com <npioli@texttrial.com>; Sean McCaffity <SMcCaffity@texttrial.com>; Tex Quesada <Quesada@texttrial.com>; jgonzalez@malc.org <jgonzalez@malc.org>; Taylor Meehan <taylor@consovoymccarthy.com>; Frank Chang <frank@consovoymccarthy.com>; Adam Mortara <mortara@lawfairllc.com>; Gary Bledsoe <gbledsoe@thebledsoelawfirm.com>

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[EXTERNAL EMAIL] This email originated outside the organization. Do not click any links or open any attachments unless you can verify the legitimacy.

Good morning counsel,

Please be advised that Senator Bettencourt is available for a deposition on July 11th, in Austin.

Sincerely, Jack DiSorbo

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